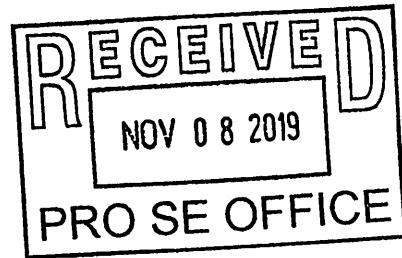


**ORIGINAL**

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Case no.: 1:19-cv-03372-AMD-RML

Date Nov 7 2019

Honorable judge Ann M Donnelly

Honorable judge Robert M. Levy

It is undisputed that on March 26 Mr. Yehuda Herskovic filed a lawsuit in Brooklyn Supreme Court index no. 1251/2019 against Verizon wireless that Verizon wireless is harassing me with phone calls and sending me three collection letters demanding money with false allegation for something that I do not owe them as a result making me sick and sleepless night and if this is not enough they damaged my credit by putting false damaging info on my credit report and as a result lost money. I demanded two things, one an order from the honorable judge that they remove the damaging information and pay me 30.000 \$ for damages 10.000\$ for each letter. And on 06/06/2019 Verizon Wireless thru their attorney's asked the court one claiming wrongfully named and to do arbitration falsely claiming that this is a fair credit reporting act. Mr. Yehuda Herskovic opposed it because it is not a fair credit reporting act it is a simple harassment and damage claim.

It is undisputed that the Court advised Mr. Yehuda Herskovic is only by consent to have arbitration, then they filed motion on 07/25/2019 to compel contractual arbitration and stay action and they provided in exhibit A an old Verizon contract dated 04/02/2014 with telephone number ending 3261 which have nothing to do with this case

misleading the court and what's more annoying is the declaration of Mr. Daniel reed in support he false testify in court and he claims to be a senior in the company an testify false .

It is undisputed that by the conference on the date 09/10/2019 that it was agreed that Verizon will provide Mr. Yehuda Herskovic a true copy of contract between Mr. Yehuda Herskovic and Verizon Wireless an conversation with the company dates an transcript the judge asked one week Kates said cant judge ask two week Kates say no then agreed three weeks as of today they have not provided any of the agreed document.

On Friday the 27 Yehuda Herskovic filed letter complaining that Mr. Kates as attorney for Verizon wireless have not complied with the agreement to provide documentation, then on 10/01/2019 Mr. Kates filed a supplemental brief with declaration of Daniel reed again a false document a contract of three pages that have only a telephone number not related an a signature undisputed an clearly not from Yehuda Herskovic an no name on it and who signature it is an who is the rep and it is dated 12/08/2019 , on 10/02/2019 they filled a correction which I don't understand what have they corrected and what was the purpose of exhibits thought the mistake is in bill but not that what so ever at the conference date Mr. Kates was arguing that all services come with two year agreement when confronted for incorrect statement he agreed to that at end the honorable judge Robert M. Levy ask us respectfully to have an settlement by Friday at the conference I explained to the court what my demand an why its  $3 \times 10.000$  for three letters and for fourth letter that was during the litigation that is really a harassment with any good cause  $20.000$  total  $50.000$  as respect to the court I lowered to  $15.000 + 2500 = 17.500$  which is 30 % from  $50.000$  I

think I was really fair then a new person came in Lisa Lawrence they offered 5000 I told her that's not even closer I gave them the last offer 4 x 3.500 total 14.000 an one thousand an another 3 days finally thy come back negative so I am going back to my initial claim of 50.000 + 3000 for misalliances .

It is undisputed that Verizon wireless have not provided any evidence to any money that Mr. Yehuda Herskovic owe Verizon wireless at the conference dated they admitted that the agreement they provided is not from me they never established that this is a fair credit reporting.

Its undisputed that Verizon wireless had harassed me with fourth letter dated 06/14/2019 this is at a time when Lisa McGriff representative of Verizon legal department promises me that they will remove false reporting and will be deleted and they working on it and the case is in litigation .

It is undisputed that they have nothing to prove that I am obligated to arbitration no contract and they submitted application for contractual arbitration an even if they had the contract they have already missed their chance for arbitration

An I conclude all motion from Verizon wireless thru their attorneys should be denied in their entirety and they should be ordered to erase the false reporting an pay the 50.000 \$ an 3000 \$ for cost an miscellanies an a order with date an penalty to erase the false credit reporting I have really tried to settle the case and its Verizon that spend so much money and time and vase my time an energy and as of today making damages to me and it's time to stop them from harming people like me , and I really appreciate your honors time an effort to resolve this matter and I thank you for that

Respectfully yours

Yehuda Herskovic



Send to Andrew Kates as attorney

For Verizon Wireless

SEGAL Mc CAMBRIDGE

SINGER & MAHONEY, LTD.

850 THIRD AVE. SUITE 1100

NEW YORK, N Y 10022

TEL 212 651 7500

FAX 212 651 7499